

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JOSEFINA DOE; ISABELA DOE;
COMMOR JEROME WELCH;
FELIPE NIOMAR MARTINEZ
ORTIZ; and JOSE DOE;
on behalf of themselves and all others
similarly situated, and
THE AMERICAN FRIENDS
SERVICE COMMITTEE,
IMMIGRANT RIGHTS PROGRAM,

Plaintiffs,

v.

U.S. DEPARTMENT OF
HOMELAND SECURITY;
U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT;

ALEJANDRO MAYORKAS,
Secretary of the Department of
Homeland Security, in his official
capacity;

PATRICK J. LECHLEITNER,
Acting Director of Immigration and
Customs Enforcement (“ICE”), in his
official capacity;

DANIEL A. BIBLE,
Executive Associate Director of ICE’s
Enforcement and Removal Operations,
in his official capacity;

CAMMILLA WAMSLEY,
Field Office Director for the ICE

Civil Action No. 2:24-cv-9105

**INDIVIDUAL PLAINTIFFS’
NOTICE OF MOTION FOR
CLASS CERTIFICATION AND
APPOINTMENT OF CLASS
COUNSEL**

ORAL ARGUMENT REQUESTED

Philadelphia Field Office, in her official capacity;

FRANCIS KEMP,
Assistant Field Office Director for the
ICE Philadelphia Field Office, in his official capacity,

Defendants.

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on October 7, 2024, or as soon as counsel may be heard, the undersigned attorneys for Plaintiffs Josefina Doe, Isabela Doe, Commor Jerome Welch, Felipe Niomar Martinez Ortiz, and Jose Doe individually and on behalf of all others similarly situated (collectively, “Individual Plaintiffs”), shall move before an Honorable Judge of the United States District Court for the District of New Jersey, Newark Vicinage, for an Order pursuant to Rules 23(a), (b)(2), and (g) of the Federal Rules of Civil Procedure to (1) certify the Proposed Class (as defined within the Class Action Complaint and enclosed Memorandum of Law); (2) appoint Individual Plaintiffs to serve as representatives of the class; and (3) appoint Lowenstein Sandler LLP, the Legal Services of New Jersey, and the Harvard Immigration & Refugee Clinical Program as Co-Class Counsel.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, the Individual Plaintiffs rely upon the accompanying (1) Memorandum of Law; (2) Declaration of Gavin J. Rooney, Esq.; (3) Declaration of Shira Wisotsky, Esq.;

(4) Declaration of Tiffany Lieu, Esq.; (5) Declaration of Ian Peacock, Ph.D.;
(6) Declaration of Josefina Doe; (7) Declaration of Isabela Doe; (8) Declaration of
Commor Jerome Welch; (9) Declaration of Felipe Niomar Martinez Ortiz; and
(10) Declaration of Jose Doe.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith pursuant to Local Civil Rule 7.1(e).

Dated: September 11, 2024

By: /s/ Gavin J. Rooney

Gavin J. Rooney, Esq.
Alexander Shalom, Esq.
Natalie J. Kraner, Esq.
Naomi D. Barrowclough, Esq.
Anish Patel, Esq. (*pro hac vice* motion
forthcoming)
Ruth Zimmerman, Esq.
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Shira Wisotsky, Esq.
Raquiba Huq, Esq.
Zoe Burke, Esq.
Emily Thorton, Esq. (*pro hac vice*
motion forthcoming)
**LEGAL SERVICES OF NEW
JERSEY**
P.O. Box 1357
Edison, New Jersey 08818
908-882-2665

Tiffany Lieu, Esq. (*pro hac vice* motion forthcoming)

Philip L. Torrey, Esq. (*pro hac vice* motion forthcoming)

**CRIMMIGRATION CLINIC
HARVARD LAW SCHOOL
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6 Everett Street, Suite 3106
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Pro Bono Counsel for Plaintiffs